

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§
FREE SPEECH SYSTEMS LLC	§ Chapter 11 (Subchapter V)
	§
	§ Case No. 22-60043
	§
Debtor.	§

**SUPPLEMENTAL DECLARATION OF ANNIE CATMULL SUBMITTED PURSUANT
TO BANKRUPTCY RULE 2014**

I, Annie Catmull, hereby submit the following statement of disinterestedness pursuant to Bankruptcy Rule 2014 and further declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct, under penalty of perjury:

1. My name is Annie Catmull. I am over the age of eighteen (18) years. I am competent to make this Declaration. I am over the age of 18 years, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. Each and every statement contained herein is true and correct to the best of my knowledge, information and belief after a diligent inquiry.

2. NetSuite: In addition to the connections I disclosed in my declaration assigned ECF # 843, I hereby make the following supplemental disclosures of arguable connections:

NetSuite is a creditor in the FSS bankruptcy case. Since approximately 2019, I have appeared as local counsel in complex chapter 11 cases on behalf of Oracle America. In some of those representations, Oracle America is or was the contractual successor in interest to NetSuite contracts. The below chart sets forth a list of the cases in which I have appeared for Oracle America as successor in interest to NetSuite. The fees my firm earned as a result of the representations are less than \$50,000 in aggregate.

Case Name	Case Number	District
iHeartMedia, Inc.	18-31274	S.D. of Texas
Mood Media Corporation and DMX, LLC	20-433768	S.D. of Texas

Case Name	Case Number	District
Tri-Point Oil & Gas Production Systems, LLC and FR Tri-Point LLC	20-31777	S.D. of Texas
J. C. Penney Company, Inc. and J.C.Penney Direct Marketing Services, LLC	20-20182	S.D. of Texas
Sorrento Therapeutics, Inc.	23-90085	S.D. of Texas
Diebold Holding Company, Inc. and Diebold Nixdorf Holding Company, Inc.	23-90602	S.D. of Texas
ConvergeOne Holdings, Inc.	24-90104	S.D. of Texas

3. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed: July 5, 2024.

Annie Catmull
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